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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
to Ensure Compatibility With)
Enhanced 911 Emergency Calling) RM-8143
Systems)

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To: The Commission

REPLY OF COMSAT CORPORATION

COMSAT Corporation, through its COMSAT Mobile Communications Division ("COMSAT"), hereby submits its Reply to comments filed on the Commission's Notice of Proposed Rule Making ("NPRM") in CC Docket No. 94-102, concerning the provision of 911 emergency calling services to mobile radio customers.¹

COMSAT fully appreciates the concerns articulated in the Commission's NPRM and in the many comments filed in this proceeding by other federal, state and local public safety agencies regarding the extension of enhanced 911 emergency calling services to domestic wireless telecommunications users. As the designated U.S. Signatory to the International Mobile Satellite Organization ("Inmarsat"), COMSAT has considerable experience in the provision of satellite-based global maritime distress and safety services ("GMDSS"), and participates in the joint government/industry advisory group on the Safety of Life at Sea ("SOLAS"). We also have been working closely with the Federal Aviation Administration, Inmarsat and the International

¹Notice of Proposed Rule Making, CC Docket No. 94-102, FCC 94-237, released October 19, 1994 ("NPRM").

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Civil Aeronautical Organization on the provision of aeronautical safety services. Based on this experience, COMSAT recognizes the utility of mobile radio services in providing distress and safety communications.

However, as our Comments in this proceeding indicate, we do not believe it is appropriate, or otherwise in the public interest, for the Commission to extend its proposed enhanced 911 rules to COMSAT's existing global mobile satellite service ("MSS") offerings.² COMSAT's position is supported by other MSS interests which have filed comments in this proceeding that question the application of enhanced 911 standards to global MSS offerings.

IDB Mobile Communications, Inc. ("IDB") in its comments demonstrates that it is impracticable to apply the Commission's 911 compatibility rules to aeronautical MSS ("AMSS") services, whether international or domestic. When using AMSS, a passenger seated in an airplane that is in flight can have no reasonable expectation of receiving emergency assistance from ground-based rescue operations.³ Moreover, as the Commission is aware, the pilot and crew have other radio communications channels available to them for air-to-ground communications. Accordingly, COMSAT agrees with IDB that there is no justification for applying enhanced 911 requirements to AMSS.

²Comments of COMSAT, CC Docket No. 94-102, filed January 9, 1995, at 3-8.

³Comments of IDB, CC Docket No. 94-102, filed January 9, 1995, at 3.

COMSAT also supports IDB's comments regarding maritime services provided over Inmarsat satellites. As IDB points out, maritime MSS users already have access to the internationally approved GMDSS priority distress system through their utilization of Inmarsat space segment.⁴ COMSAT notes that the Coast Guard in its comments also recognizes the utility of GMDSS, and other marine telecommunications systems, for sending emergency maritime distress calls in U.S. waters.⁵ Because GMDSS is already available to Inmarsat users worldwide, including users in the United States, the Commission should exclude maritime MSS from enhanced 911 requirements.

Regarding the provision of land mobile MSS services, COMSAT has previously noted that the Commission's current domestic MSS policy requires COMSAT to transition any land mobile customers to American Mobile Satellite Corporation ("AMSC") once AMSC's first satellite is operational. Even if COMSAT is permitted to continue its land mobile operations in the U.S. on some limited basis after AMSC is operational, COMSAT believes that its customers will neither expect, nor require, access to enhanced 911 services.⁶ However, should any customer require emergency assistance, they may dial a COMSAT Land Earth Station operator who can then assist in directing the call to an appropriate

⁴Comments of IDB at 4.

⁵Comments of the U.S. Coast Guard, CC Docket No. 94-102, filed January 9, 1995, at 1-2.

⁶COMSAT Comments at 6-8.

response agency. Accordingly, we do not believe that it is appropriate to require COMSAT's land mobile MSS services to comply with enhanced 911.

We note that AMSC in its comments in this proceeding also has urged the Commission to refrain from imposing the full range of enhanced 911 features on its operations.⁷ AMSC anticipates that it will pass 911 calls to an outside vendor who will interrogate the caller and then forward the call to an appropriate public safety entity.⁸ AMSC's system will not be able to prioritize 911 calls or determine the location of a mobile customer. Moreover, AMSC has expressed concern, as did COMSAT, for the substantial costs associated with its provision of a full range of enhanced 911 requirements which could significantly increase the cost of the mobile terminal. COMSAT agrees with AMSC that the economic and technical burdens associated with MSS 911 compatibility could drastically curtail customer demand for MSS service.

Other "Big LEO" MSS providers also have questioned the imposition of enhanced 911 requirements on future global MSS offerings and have urged the Commission to refrain from addressing enhanced 911 issues for these systems at this time. For example, TRW Inc. ("TRW") suggests that it is "neither practical nor reasonable" to apply 911 compatibility requirements

⁷Comments of AMSC, CC Docket No. 94-102, filed January 9, 1995, at 8.

⁸AMSC Comments at 3-4.

to MSS because the system's global coverage would make it virtually impossible to locate and assist a caller during an emergency.⁹ TRW also notes that the particular implementation approach adopted by the Commission, which refers to the location of callers based on their proximity to a "base unit or cell site," is geared towards terrestrial services.¹⁰

Motorola's comments are similar to those of TRW. Motorola indicates that its global MSS system will have a location capability which is considerably less precise than that contemplated by the NPRM.¹¹ In addition, Motorola notes that the Commission's proposed requirement to route calls to the closest public safety answering position ("PSAP") does not have the same meaning within the MSS context as within the terrestrial call context.

COMSAT supports the general conclusion reached by both TRW and Motorola that the Commission's proposed wireless 911 compatibility rules are more appropriately directed at terrestrial providers of local (real-time) wireless communications services. However, as evidenced by the comments of the terrestrial wireless service providers, there is considerable skepticism regarding the technical and economic feasibility of complying with the Commission's proposed 911

⁹Comments of TRW, CC Docket No. 94-102, filed January 9, 1995, at 1-5.

¹⁰Comments of TRW at 6.

¹¹Motorola Comments, CC Docket No. 94-102, filed January 9, 1995, at 9-10.

compatibility standards.¹² Accordingly, we believe it is reasonable for the Commission to follow the suggestion of the Cellular Telecommunications Industry Association ("CTIA") and appoint a technical advisory group consisting of government and industry participants to address the technical, procedural and economic issues associated with wireless enhanced 911 services.¹³

Finally, we agree with MSS interests that it would be premature for the Commission to impose 911 compatibility requirements on non-geostationary ("NGSO") MSS systems.¹⁴ The Big LEO MSS systems and the Inmarsat-P system presently under development will have the capability to switch between MSS systems and terrestrial cellular/personal communications services ("PCS") systems. As the satellite and cellular technologies converge, it is hoped that a dual mode handset, which will enable the global MSS user to place a local call by interconnecting with a local cellular or PCS system, will provide an effective solution to the issue of adopting enhanced 911 standards for global MSS systems. However, it is too early in the

¹²See, e.g., Comments of the Cellular Telecommunications Association, CC Docket No. 94-102, filed January 9, 1995.

¹³See CTIA Comments at 12-15. As COMSAT and other parties to this proceeding have indicated, the Commission also should coordinate the adoption of 911 compatibility requirements with international regulatory bodies such as the International Telecommunication Union ("ITU"). See COMSAT Comments at 9-10. Moreover, there appears to be broad support for labeling any non-conforming wireless equipment. See, e.g., Comments of the U.S. Coast Guard.

¹⁴See, e.g., Comments of Constellation Communications Inc., CC Docket No. 94-102, filed January 9, 1995, at 2.

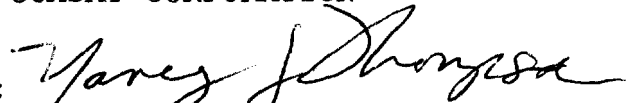
developmental process for the Commission to make regulatory decisions regarding the imposition of enhanced 911 requirements on such future NGSO MSS services.

For the reasons set forth above, and in our Comments filed in this proceeding on January 9, 1995, the Commission should refrain from imposing enhanced 911 requirements on COMSAT's existing global MSS services or on planned NGSO MSS systems and should establish a technical advisory group to resolve 911 compatibility issues for terrestrial wireless systems.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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